

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TYPHOON IP LLC,

Plaintiff,

v.

NNG LLC,

Defendant.

Civil Action No.: 1:21-cv-00322-CFC

TRIAL BY JURY DEMANDED

REQUEST FOR ENTRY OF DEFAULT AS TO
DEFENDANT NNG LLC

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Typhoon IP LLC (hereinafter referred to as “Plaintiff”), by and through undersigned counsel, hereby respectfully requests that the Clerk enter a default as to Defendant NNG LLC, (hereinafter referred to as “Defendant”), on the basis that Defendant has failed to timely answer or otherwise respond to Plaintiff’s Complaint (D.E. 1) in this action despite being properly served. In support of this request, Plaintiff files herewith the Affidavit of Jimmy Chong.

Dated: July 16, 2021

CHONG LAW FIRM PA

Of counsel:

Howard L. Wernow (*Pro hac vice*)
Sand, Sebolt & Wernow Co., LPA
Aegis Tower – Suite 1100
4940 Munson Street NW
Canton, Ohio 44718
Telephone: (330) 244-1174
Facsimile: (330) 244-1173
Email: howard.wernow@sswip.com

/s/ Jimmy Chong
Jimmy Chong (#4839)
2961 Centerville Road – Suite 350
Wilmington, Delaware 19808
Telephone: (302) 999-9480
Facsimile: (877) 796-4627
chong@chonglawfirm.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that on the 16 day of July, 2021, the foregoing Request for Entry of Default and Affidavit in Support of Request for Entry of Default was sent to the Defendant, c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

/s/ Jimmy Chong
Jimmy Chong (#4839)